

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

IN RE: BLUE CROSS BLUE SHIELD  
ANTITRUST LITIGATION  
(MDL No. 2406)

**Master File No.:**  
**2:13-CV-20000-RDP**

This document relates to all cases.

**PLAINTIFFS' OPPOSED MOTION TO COMPEL PRODUCTION OF DOCUMENTS BY  
BLUE CROSS BLUE SHIELD OF MICHIGAN**

Come now Plaintiffs and respectfully move for an entry of an Order compelling Defendant Blue Cross Blue Shield of Michigan to produce documents produced in the recently-settled case, *Aetna, Inc. v. Blue Cross Blue Shield of Michigan*, No. 2:11-cv-15346-DPH-MKM (E.D. Mich. 2011). In support for Plaintiffs' Motion, Plaintiffs rely on their Brief in Support of Their Motion to Compel and In Opposition to Defendant Blue Cross Blue Shield of Michigan's Motion for Protective Order filed simultaneously with this Motion.

Respectfully submitted the 1<sup>st</sup> day of September, 2015.

<u><b>Provider Track</b></u>	<u><b>Subscriber Track</b></u>
<u>/s/ Joe R. Whatley, Jr.</u> Joe R. Whatley, Jr. – <b><i>Co-Lead Counsel</i></b> W. Tucker Brown WHATLEY KALLAS, LLP 2001 Park Place North 1000 Park Place Tower Birmingham, AL 35203 Tel: (205) 488-1200 Fax: (800) 922-4851 Email: <a href="mailto:jwhatley@whatleykallas.com">jwhatley@whatleykallas.com</a> <a href="mailto:tbrown@whatleykallas.com">tbrown@whatleykallas.com</a>	<u>/s/ David Boies</u> David Boies – <b><i>Co-Lead Counsel</i></b> BOIES, SCHILLER & FLEXNER LLP 333 Main Street Armonk, NY 10504 Tel: (914) 749-8200 Fax: (914) 749-8200 <a href="mailto:dboies@bsflp.com">dboies@bsflp.com</a>
Edith M. Kallas – <b><i>Co-Lead Counsel</i></b> Patrick J. Sheehan WHATLEY KALLAS, LLP 1180 Avenue of the Americas, 20th Floor New York, NY 10036 Tel: (212) 447-7060 Fax: (800) 922-4851 Email: <a href="mailto:ekallas@whatleykallas.com">ekallas@whatleykallas.com</a> <a href="mailto:psheehan@whatleykallas.com">psheehan@whatleykallas.com</a>	Michael Hausfeld – <b><i>Co-Lead Counsel</i></b> William Butterfield – <b><i>Chair, Discovery Committee</i></b> HAUSFELD LLP 1700 K Street NW, Suite 650 Washington, DC 20006 Tel: (202) 540-7200 Fax: (202) 540-7201 <a href="mailto:mhausfeld@hausfeldllp.com">mhausfeld@hausfeldllp.com</a> <a href="mailto:wbutterfield@hausfeldllp.com">wbutterfield@hausfeldllp.com</a>
Henry C. Quillen WHATLEY KALLAS, LLP 159 Middle Street, Suite 2C Portsmouth, NH 03801 Tel: (603) 294-1591 Fax: (800) 922-4851 Email: <a href="mailto:hquillen@whatleykallas.com">hquillen@whatleykallas.com</a>	
Deborah J. Winegard WHATLEY KALLAS, LLP 1068 Virginia Avenue, NE Atlanta, GA 30306 Tel: (404) 607-8222 Fax: (404) 607-8451 Email: <a href="mailto:dwinegard@whatleykallas.com">dwinegard@whatleykallas.com</a>	

<p>E. Kirk Wood, Jr. – <b>Local Facilitating Counsel</b>  WOOD LAW FIRM LLC  P. O. Box 382434  Birmingham, AL 35238  Tel: (205) 612-0243  Fax: (205) 705-1223  Email: <a href="mailto:ekirkwood1@bellsouth.net">ekirkwood1@bellsouth.net</a></p>	<p>Chris T. Hellums – <b>Local Facilitating Counsel</b>  PITTMAN, DUTTON &amp; HELLUMS, P.C.  2001 Park Place N, 1100 Park Place Tower  Birmingham, AL 35203  Tel: (205) 322-8880  Fax: (205) 328-2711  <a href="mailto:chrish@pittmandutton.com">chrish@pittmandutton.com</a></p>
<p style="text-align: center;"><u>/s/ Barry A. Ragsdale</u>  Barry Alan Ragsdale – <b>Plaintiffs’ Liaison Counsel and Discovery Liaison Counsel</b>  SIROTE &amp; PERMUTT P.C.  P.O. Box 55727  Birmingham, AL 35255-5727  Tel: (205) 930-5114  Fax: (205) 212-2932  Email: <a href="mailto:bragsdale@sirote.com">bragsdale@sirote.com</a></p>	
<b><u>Provider Track</u></b>	<b><u>Subscriber Track</u></b>
<p>J. Mark White – <b>Litigation Committee</b>  Augusta S. Dowd – <b>Chair, Litigation Committee</b>  U.W. Clemon – <b>Plaintiffs’ Steering Committee</b>  Linda G. Flippo – <b>Discovery Committee</b>  WHITE ARNOLD &amp; DOWD, P.C.  The Massey Building  2025 Third Avenue North, Suite 500  Birmingham, AL 35203  Tel: (205) 323-1888  Fax: (205) 323-8907  Email: <a href="mailto:uwclemon@whitearnolddowd.com">uwclemon@whitearnolddowd.com</a>  <a href="mailto:adowd@whitearnolddowd.com">adowd@whitearnolddowd.com</a>  <a href="mailto:mwhite@whitearnolddowd.com">mwhite@whitearnolddowd.com</a></p>	<p>William A. Isaacson – <b>Settlement Committee &amp; PSC Member</b>  BOIES, SCHILLER &amp; FLEXNER LLP  5301 Wisconsin Avenue NW  Washington, DC 20015  Tel: (202) 237-2727  Fax: (202) 237-6131  <a href="mailto:wisaacson@bsflp.com">wisaacson@bsflp.com</a></p>
<p>Aaron S. Podhurst – <b>Plaintiffs’ Steering Committee</b>  Peter Prieto – <b>Chair, Expert Committee</b>  PODHURST ORSECK, P.A.  25 West Flagler Street, Suite 800  Miami, FL 33130  Tel: (305) 358-2800  Fax: (305) 358-2382  Email: <a href="mailto:apodhurst@podhurst.com">apodhurst@podhurst.com</a>  <a href="mailto:pprieto@podhurst.com">pprieto@podhurst.com</a></p>	<p>Gregory Davis – <b>Settlement Committee &amp; PSC Member</b>  DAVIS &amp; TALIAFERRO, LLC  7031 Halcyon Park Drive  Montgomery, AL 36117  Tel: (334) 832-9080  Fax: (334) 409-7001  <a href="mailto:gldavis@knology.net">gldavis@knology.net</a></p>

<p>Debra B. Hayes – <i>Plaintiffs’ Steering Committee</i>  Charles Clinton Hunter  THE HAYES LAW FIRM  700 Rockmead, Suite 210  Kingwood, TX 77339  Tel: (281) 815-4963  Fax: (832) 575-4759  <a href="mailto:dhayes@dhayeslaw.com">dhayes@dhayeslaw.com</a>  <a href="mailto:chunter@dhayeslaw.com">chunter@dhayeslaw.com</a></p>	<p>Megan Jones – <i>Settlement Committee &amp; PSC Member</i>  Arthur Bailey – <i>Discovery Committee</i>  HAUSFELD LLP  44 Montgomery Street, Suite 3400  San Francisco, CA 94104  Tel: (415) 744-1970  Fax: (415) 358-4980  <a href="mailto:mjones@hausfeldllp.com">mjones@hausfeldllp.com</a>  <a href="mailto:abailey@hausfeldllp.com">abailey@hausfeldllp.com</a></p>
<p>Dennis Pantazis – <i>Plaintiffs’ Steering Committee</i>  Brian Clark – <i>Discovery Committee</i>  WIGGINS CHILDS PANTAZIS FISHER  GOLDFARB  The Kress Building  301 Nineteenth Street North  Birmingham, AL 35203  Tel: (205) 314-0500  Fax: (205) 254-1500  Email: <a href="mailto:dgp@wcqp.com">dgp@wcqp.com</a>  <a href="mailto:bclark@wcqp.com">bclark@wcqp.com</a></p> <p>Dennis C. Reich – <i>Chair, Damages Committee</i>  REICH &amp; BINSTOCK, LLP  4265 San Felipe, Suite 1000  Houston, TX 77027  Tel: (713) 622-7271  Fax: (713) 623-8724  Email: <a href="mailto:dreich@rbfirm.net">dreich@rbfirm.net</a></p>	<p>Kathleen Chavez – <i>Settlement Committee &amp; PSC Member</i>  FOOTE, MIELKE, CHAVEZ &amp; O’NEIL, LLC  10 West State Street, Suite 200  Geneva, IL 60134  Tel: (630) 797-3339  Fax: (630) 232-7452  <a href="mailto:kcc@fmcolaw.com">kcc@fmcolaw.com</a></p>
<p>Nicholas B. Roth – <i>Chair, Discovery Committee</i>  Julia Smeds Roth – <i>Discovery Committee</i>  EYSTER KEY TUBB ROTH MIDDLETON &amp;  ADAMS, LLP  402 East Moulton Street  Decatur, AL 35601  Tel: (256) 353-6761  Fax: (256) 353-6767  Email: <a href="mailto:nroth@eysterkey.com">nroth@eysterkey.com</a>  <a href="mailto:jroth@eysterkey.com">jroth@eysterkey.com</a></p>	<p>Cyril V. Smith – <i>Settlement Committee &amp; PSC Member</i>  ZUCKERMAN SPAEDER, LLP  100 East Pratt Street, Suite 2440  Baltimore, MD 21202-1031  Tel: (410) 949-1145  Fax: (410) 659-0436  <a href="mailto:csmith@zuckerman.com">csmith@zuckerman.com</a></p>

<p>Robert J. Axelrod – <b><i>Chair, Written Submissions Committee</i></b>  AXELROD &amp; DEAN LLP  830 Third Avenue, 5th Floor  New York, NY 10022  Tel: (646) 448-5263  Fax: (212) 840-8560  Email: <a href="mailto:rjaxelrod@axelroddean.com">rjaxelrod@axelroddean.com</a></p>	<p>Eric L. Cramer – <b><i>Expert Committee</i></b>  BERGER &amp; MONTAGUE, P.C.  1622 Locust Street  Philadelphia, PA 19103  Tel: 1-800-424-6690  Fax: (215) 875-4604  <a href="mailto:ecramer@bm.net">ecramer@bm.net</a></p>
<p>Van Bunch – <b><i>Chair, Class Certification Committee</i></b>  BONNETT FAIRBOURN FRIEDMAN &amp; BALINT, P.C.  2325 E. Camelback Road, Suite 300  Phoenix, AZ 85016  Tel: (602) 274-1100  Fax: (602) 274-1199  Email: <a href="mailto:vbunch@bffb.com">vbunch@bffb.com</a></p>	<p>Richard A. Feinstein – <b><i>Co-Chair, Expert Committee</i></b>  Karen Dyer – <b><i>Expert Committee</i></b>  Hamish P.M. Hume – <b><i>Discovery Committee</i></b>  Kathleen Kiernan – <b><i>Written Submissions Committee</i></b>  BOIES, SCHILLER &amp; FLEXNER LLP  5301 Wisconsin Avenue NW  Washington, DC 20015  Tel: (202) 237-2727  Fax: (202) 237-6131  <a href="mailto:tchutkan@bsfllp.com">tchutkan@bsfllp.com</a>  <a href="mailto:kdyer@bsfllp.com">kdyer@bsfllp.com</a>  <a href="mailto:hhume@bsfllp.com">hhume@bsfllp.com</a>  <a href="mailto:kkiernan@bsfllp.com">kkiernan@bsfllp.com</a></p>
<p>David A. Balto – <b><i>Expert Committee</i></b>  DAVID A. BALTO LAW OFFICES  1350 I Street, N.W., Suite 850  Washington, DC 20005  Tel: (202) 789-5424  Fax: (202) 589-1819  Email: <a href="mailto:david.balto@dcantitrustlaw.com">david.balto@dcantitrustlaw.com</a></p>	<p>Patrick Cafferty – <b><i>Discovery Committee</i></b>  CAFFERTY CLOBES MERIWETHER &amp; SPRENGEL LLP  101 North Main Street, Suite 565  Ann Arbor, MI 48104  Tel: (734) 769-2144  Fax: (734) 769-1207  <a href="mailto:pcafferty@caffertyclobes.com">pcafferty@caffertyclobes.com</a></p>

<p>Peter H. Burke – <i>Class Certification Committee</i>  J. Allen Schreiber – <i>Litigation Committee</i>  BURKE HARVEY, LLC  3535 Grandview Parkway  Suite 100  Birmingham, AL 35243  Tel: (205) 930-9091  Fax: (205) 930-9054  Email: <a href="mailto:pburke@burkeharvey.com">pburke@burkeharvey.com</a>  <a href="mailto:aschreiber@burkeharvey.com">aschreiber@burkeharvey.com</a></p> <p>Richard S. Frankowski – <i>Discovery Committee</i>  THE FRANKOWSKI FIRM, LLC  231 22<sup>nd</sup> Street South, Suite 203  Birmingham, AL 35233  Tel: (205) 390-0399  Fax: (205) 390-1001  Email: <a href="mailto:richard@frankowskifirm.com">richard@frankowskifirm.com</a></p>	<p>Bryan Clobes – <i>Litigation Committee</i>  Ellen Meriwether – <i>Written Submissions Committee</i>  CAFFERTY CLOBES MERIWETHER &amp; SPRENGEL LLP  1101 Market Street, Suite 2650  Philadelphia, PA 19107  Tel: (215) 864-2800  Fax: (215) 864-2810  <a href="mailto:bclobes@caffertyclobes.com">bclobes@caffertyclobes.com</a>  <a href="mailto:meriwether@caffertyclobes.com">meriwether@caffertyclobes.com</a></p>
<p>John C. Davis – <i>Written Submissions Committee</i>  LAW OFFICE OF JOHN C. DAVIS  623 Beard Street  Tallahassee, FL 32303  Tel: (850) 222-4770  Email: <a href="mailto:john@johndavislaw.net">john@johndavislaw.net</a></p>	<p>Douglas Dellaccio – <i>Litigation Committee</i>  CORY WATSON CROWDER &amp; DEGARIS, P.C.  2131 Magnolia Avenue, Suite 200  Birmingham, AL 32505  Tel: (205) 328-2200  Fax: (205) 324-7896  <a href="mailto:ddellaccio@cwcd.com">ddellaccio@cwcd.com</a></p>
<p>Lynn W. Jinks, III – <i>Expert Committee</i>  Christina D. Crow – <i>Discovery Committee</i>  JINKS CROW &amp; DICKSON, P.C.  219 North Prairie Street  Union Springs, AL 36089  Tel: (334) 738-4225  Fax: (334) 738-4229  Email: <a href="mailto:ljinks@jinkslaw.com">ljinks@jinkslaw.com</a>  <a href="mailto:ccrow@jinkslaw.com">ccrow@jinkslaw.com</a></p>	<p>Chris Cowan – <i>Damages Committee</i>  THE COWAN LAW FIRM  One Meadows Building  5005 Greenville Avenue, Suite 200  Dallas, TX 75206  Tel: (214) 826-1900  Fax: (214) 826-8900  <a href="mailto:chris@cowanlaw.net">chris@cowanlaw.net</a></p>

W. Daniel Miles, III – <b><i>Written Submissions Committee</i></b> BEASLEY ALLEN CROW METHVIN PORTIS & MILES, P.C. 218 Commerce Street Montgomery, AL 36104 Tel: (800) 898-2034 Fax: (334) 954-7555 Email: <a href="mailto:dee.miles@beasleyallen.com">dee.miles@beasleyallen.com</a>	Edwin J. Kilpela, Jr. Benjamin Sweet – <b><i>Litigation Committee</i></b> CARLSON LYNCH LTD 115 Federal St., Suite 210 Pittsburgh, PA 15212 Tel: (412) 322-9243 Fax: (412) 231-0246 <a href="mailto:ekilpela@carlsonlynch.com">ekilpela@carlsonlynch.com</a> <a href="mailto:bsweet@carlsonlynch.com">bsweet@carlsonlynch.com</a>
Joey K. James – <b><i>Litigation Committee</i></b> BUNCH & JAMES P. O. Box 878 Florence, AL 35631 Tel: (256) 764-0095 Fax: (256) 767-5705 Email: <a href="mailto:joey@bunchandjames.com">joey@bunchandjames.com</a>	Robert M. Foote – <b><i>Damages Committee</i></b> FOOTE, MIELKE, CHAVEZ & O'NEIL, LLC 10 West State Street, Suite 200 Geneva, IL 60134 Tel: (630) 797-3339 Fax: (630) 232-7452 <a href="mailto:rmf@fmcolaw.com">rmf@fmcolaw.com</a>
Mark K. Gray – <b><i>Discovery Committee</i></b> GRAY & WHITE 713 E. Market Street, Suite 200 Louisville, KY 40202 Tel: (502) 805-1800 Fax: (502) 618-4059 Email: <a href="mailto:mgray@grayandwhitelaw.com">mgray@grayandwhitelaw.com</a>	Charles T. Caliendo – <b><i>Class Certification Committee</i></b> GRANT & EISENHOFER 485 Lexington Avenue New York, NY 10017 Tel: (646) 722-8500 Fax: (646) 722-8501 <a href="mailto:ccaliendo@gelaw.com">ccaliendo@gelaw.com</a>
Stephen M. Hansen – <b><i>Class Certification Committee</i></b> LAW OFFICE OF STEPHEN M. HANSEN 1821 Dock Street Tacoma, WA 98402 Tel: (253) 302-5955 Fax: (253) 301-1147 Email: <a href="mailto:steve@stephenmhansenlaw.com">steve@stephenmhansenlaw.com</a>	Robert Eisler – <b><i>Discovery Committee</i></b> GRANT & EISENHOFER 123 Justison Street Wilmington, DE 19801 Tel: (302) 622-7000 Fax: (302) 622-7100 <a href="mailto:reisler@gelaw.com">reisler@gelaw.com</a>

<p>Harley S. Tropin – <b><i>Damages Committee</i></b>  Javier A. Lopez – <b><i>Discovery Committee</i></b>  KOZYAK TROPIN &amp;  THROCKMORTON, P.A.  2525 Ponce De Leon Boulevard, 9th Floor  Miami, FL 33134  Tel: (305) 372-1800  Fax: (305) 372-3508  Email: <a href="mailto:hst@kttl.com">hst@kttl.com</a>  <a href="mailto:jal@kttl.com">jal@kttl.com</a></p>	<p>David Guin – <b><i>Chair, Written Submissions Committee</i></b>  Tammy Stokes – <b><i>Damages Committee</i></b>  GUIN, STOKES &amp; EVANS, LLC  The Financial Center  505 20th Street North, Suite 1000  Birmingham, AL 35203  Tel: (205) 226-2282  Fax: (205) 226-2357  <a href="mailto:davidg@gseattorneys.com">davidg@gseattorneys.com</a>  <a href="mailto:tammys@gseattorneys.com">tammys@gseattorneys.com</a></p>
<p>C. Wes Pittman – <b><i>Settlement Committee</i></b>  THE PITTMAN FIRM, P.A.  432 McKenzie Avenue  Panama City, FL 32401  Tel: (850) 784-9000  Fax: (850) 763-6787  Email: <a href="mailto:wes@pittmanfirm.com">wes@pittmanfirm.com</a></p>	<p>Daniel Gustafson – <b><i>Litigation Committee</i></b>  Daniel C. Hedlund – <b><i>Damages Committee</i></b>  GUSTAFSON GLUEK PLLC  120 South Sixth Street, Suite 2600  Minneapolis, MN 55402  Tel: (612) 333-8844  Fax: (612) 339-6622  <a href="mailto:dgustafson@gustafsongluek.com">dgustafson@gustafsongluek.com</a>  <a href="mailto:dhedlund@gustafsongluek.com">dhedlund@gustafsongluek.com</a></p>
<p>Robert B. Roden – <b><i>Litigation Committee</i></b>  SHELBY RODEN, LLC  2956 Rhodes Circle  Birmingham, AL 35205  Tel: (205) 933-8383  Fax: (205) 933-8386  Email: <a href="mailto:rroden@shelbyroden.com">rroden@shelbyroden.com</a></p>	<p>Brent Hazzard – <b><i>Litigation Committee</i></b>  HAZZARD LAW, LLC  447 Northpark Drive  Ridgeland, MS 39157  Tel: (601) 977-5253  Fax: (601) 977-5236  <a href="mailto:brenthazzard@yahoo.com">brenthazzard@yahoo.com</a></p>
<p>Gary E. Mason – <b><i>Class Certification Committee</i></b>  WHITFIELD BRYSON &amp; MASON, LLP  1625 Massachusetts Ave. NW, Suite 605  Washington, DC 20036  Tel: (202) 429-2290  Fax: (202) 640-1160  Email: <a href="mailto:gmason@wbmlp.com">gmason@wbmlp.com</a></p>	<p>John Saxon – <b><i>Litigation Committee</i></b>  JOHN D. SAXON, P.C.  2119 3rd Avenue North  Birmingham, AL 35203-3314  Tel: (205) 324-0223  Fax: (205) 323-1583  <a href="mailto:jsaxon@saxonattorneys.com">jsaxon@saxonattorneys.com</a></p>



<p>Lance Michael Sears SEARS &amp; SWANSON, P.C. First Bank Building 2 North Cascade Avenue, Suite 1250 Colorado Springs, CO 80903 Tel: (719) 471-1984 Fax: (719) 577-4356 Email: <a href="mailto:lance@searsassociates.com">lance@searsassociates.com</a></p>	<p>Lawrence Jones – <i>Damages Committee</i> JONES WARD PLC 312 South Fourth Street, Sixth Floor Louisville, KY 40202 Tel: (502) 882-6000 <a href="mailto:larry@jonesward.com">larry@jonesward.com</a></p>
<p>Michael C. Dodge – <i>Expert Committee</i> GLAST PHILLIPS &amp; MURRAY, P.C. 14801 Quorum Drive, Suite 500 Dallas, TX 75254 Tel: (972) 419-7172 Email: <a href="mailto:mdodge@gpm-law.com">mdodge@gpm-law.com</a></p>	<p>Andrew Lemmon – <i>Chair, Discovery Committee</i> LEMMON LAW FIRM 650 Poydras Street, Suite 2335 New Orleans, LA 70130 Tel: (504) 581-5644 Fax: (504) 581-2156 <a href="mailto:andrew@lemmonlawfirm.com">andrew@lemmonlawfirm.com</a></p>
<p>Michael E. Gurley, Jr. – <i>Discovery Committee</i> Attorney at Law 24108 Portobello Road Birmingham, AL 35242 Tel: (205) 908-6512 Email: <a href="mailto:Michael@gurleylaw.net">Michael@gurleylaw.net</a></p>	<p>Virginia Buchanan – <i>Chair, Class Certification Committee</i> LEVIN PAPANTONIO THOMAS MITCHELL RAFFERTY &amp; PROCTOR, P.A. 316 South Baylen Street, Suite 600 Pensacola, FL 32502 Tel: (850) 435-7000 Fax: (850) 435-7020 <a href="mailto:vbuchanan@levinlaw.com">vbuchanan@levinlaw.com</a></p>
<p>Myron C. Penn – <i>Discovery Committee</i> PENN &amp; SEABORN, LLC 53 Highway 110 Post Office Box 5335 Union Springs, AL 36089 Tel: (334) 738-4486 Fax: (334) 738-4432 Email: <a href="mailto:myronpenn28@hotmail.com">myronpenn28@hotmail.com</a></p>	<p>Robert Methvin – <i>Chair, Settlement Committee</i> James M. Terrell – <i>Class Certification Committee</i> MCCALLUM, METHVIN &amp; TERRELL, P.C. The Highland Building 2201 Arlington Avenue South Birmingham, AL 35205 Tel: (205) 939-0199 Fax: (205) 939-0399 <a href="mailto:rgm@mmlaw.net">rgm@mmlaw.net</a> <a href="mailto:jterrell@mmlaw.net">jterrell@mmlaw.net</a></p>

<p>Troy A. Doles – <b><i>Discovery Committee</i></b>  SCHLICHTER BOGARD &amp; DENTON, LLP  100 S. 4th Street, Suite 900  St. Louis, MO 63102  Tel: (314) 621-6115  Fax: (314) 621-7151  Email: <a href="mailto:tadoles@uselaws.com">tadoles@uselaws.com</a></p>	<p>Michael McGartland – <b><i>Class Certification Committee</i></b>  MCGARTLAND &amp; BORCHARDT LLP  1300 South University Drive, Suite 500  Fort Worth, TX 76107  Tel: (817) 332-9300  Fax: (817) 332-9301  <a href="mailto:mike@attorneysmb.com">mike@attorneysmb.com</a></p>
<p>J. Preston Strom, Jr. – <b><i>Litigation Committee</i></b>  STROM LAW FIRM, LLC  2110 N. Beltline Boulevard, Suite A  Columbia, SC 29204-3905  Tel: (803) 252-4800  Fax: (803) 252-4801  Email: <a href="mailto:petestrom@stromlaw.com">petestrom@stromlaw.com</a></p>	<p>H. Lewis Gillis – <b><i>Co-Head Chair, Litigation Committee</i></b>  MEANS GILLIS LAW, LLC  3121 Zelda Court  Montgomery, AL 36106  Tel: 1-800-626-9684  <a href="mailto:hlgillis@tmgsllaw.com">hlgillis@tmgsllaw.com</a></p>
<p>Thomas V. Bender – <b><i>Discovery Committee</i></b>  WALTERS BENDER STROHBEHN  &amp; VAUGHAN, P.C.  2500 City Center Square, 1100 Main  Kansas City, MO 64105  Tel: (816) 421-6620  Fax: (816) 421-4747  Email: <a href="mailto:tbender@wbsvllaw.com">tbender@wbsvllaw.com</a></p>	<p>David J. Hodge – <b><i>Chair, Settlement Committee</i></b>  MORRIS, KING &amp; HODGE  200 Pratt Avenue NE  Huntsville, AL 35801  Tel: (256) 536-0588  Fax: (256) 533-1504  <a href="mailto:lstewart@alinjuryllaw.com">lstewart@alinjuryllaw.com</a></p>
<p>Michael L. Murphy – <b><i>Discovery Committee</i></b>  BAILEY GLASSER LLP  910 17<sup>th</sup> Street, NW, Suite 800  Washington, DC 20006  Tel: (202) 463-2101  Fax: (202) 463-2103  <a href="mailto:mmurphy@baileyglasser.com">mmurphy@baileyglasser.com</a></p> <p>Brian E. Wojtalewicz  WOJTALEWICZ LAW FIRM, LTD.  139 N. Miles Street  Appleton, MN 56208  Tel: (320) 289-2363  Fax: (320) 289-2369  Email: <a href="mailto:brian@wojtalewiczlawfirm.com">brian@wojtalewiczlawfirm.com</a></p>	<p>Dianne M. Nast – <b><i>Class Certification Committee</i></b>  NASTLAW LLC  1101 Market Street, Suite 2801  Philadelphia, PA 19107  Tel: (215) 923-9300  Fax: (215) 923-9302  <a href="mailto:dnast@nastlaw.com">dnast@nastlaw.com</a></p> <p>Patrick W. Pendley – <b><i>Chair, Damages Committee</i></b>  Christopher Coffin – <b><i>State Liaison Committee</i></b>  PENDLEY, BAUDIN &amp; COFFIN, LLP  Post Office Drawer 71  Plaquemine, LA 70765  Tel: (225) 687-6369  <a href="mailto:pwpendley@pbclawfirm.com">pwpendley@pbclawfirm.com</a>  <a href="mailto:ccoffin@pbclawfirm.com">ccoffin@pbclawfirm.com</a></p>

<p>Archie C. Lamb, Jr.  ARCHIE LAMB &amp; ASSOCIATES, LLC  2900 1st Avenue South  Birmingham, AL 35233  (205) 324-4644  (205) 324-4649 Fax  alamb@archielamb.com</p>	<p>Edgar D. Gankendorff – <i>Co-Head Chair, Litigation Committee</i>  Eric R.G. Belin – <i>Damages Committee</i>  PROVOSTY &amp; GANKENDORFF, LLC  650 Poydras Street, Suite 2700  New Orleans, LA 70130  Tel: (504) 410-2795  Fax: (504) 410-2796  <a href="mailto:egankendorff@provostylaw.com">egankendorff@provostylaw.com</a>  <a href="mailto:ebelin@provostylaw.com">ebelin@provostylaw.com</a></p>
<p>Paul Lundberg  LUNDBERG LAW, PLC  600 4<sup>TH</sup> Street, Suite 906  Sioux City, IA 51101  Tel: (712) 234-3030  Fax: (712) 234-3034  Email: <a href="mailto:paul@lundberglawfirm.com">paul@lundberglawfirm.com</a></p>	<p>Richard Rouco – <i>Written Submissions Committee</i>  QUINN, CONNOR, WEAVER, DAVIES &amp; ROUCO LLP  Two North Twentieth Street  2 – 20<sup>th</sup> Street North, Suite 930  Birmingham, AL 35203  Tel: (205) 870-9989  Fax: (205) 870-9989  <a href="mailto:rrouco@qcwdr.com">rrouco@qcwdr.com</a></p>
<p>Jessica Dillon  Ray R. Brown  Molly Brown  DILLON &amp; FINDLEY, P.C.  1049 W. 5<sup>th</sup> Avenue, Suite 200  Anchorage, AK 99501  Tel: (907) 277-5400  Fax: (907) 277-9896  Email: <a href="mailto:Jessica@dillonfindley.com">Jessica@dillonfindley.com</a>  <a href="mailto:Ray@dillonfindley.com">Ray@dillonfindley.com</a>  <a href="mailto:Molly@dillonfindley.com">Molly@dillonfindley.com</a></p>	<p>Garrett Blanchfield – <i>Written Submissions Committee</i>  REINHARDT, WENDORF &amp; BLANCHFIELD  E-1250 First National Bank Building  332 Minnesota Street  St. Paul, MN 55101  Tel: (651) 287-2100  Fax: (651) 287-2103  <a href="mailto:g.blanchfield@rwblawfirm.com">g.blanchfield@rwblawfirm.com</a></p>
<p>James Redmond  Cynthia C. Moser  HEIDMAN LAW FIRM  1128 Historic 4<sup>th</sup> Street  P. O. Box 3086  Sioux City, IA 51101  Tel: (712) 255-8838  Fax (712) 258-6714  Email: <a href="mailto:Jim.Redmond@heidmanlaw.com">Jim.Redmond@heidmanlaw.com</a>  <a href="mailto:Cynthia.Moser@heidmanlaw.com">Cynthia.Moser@heidmanlaw.com</a></p>	<p>Jason Thompson – <i>Damages Committee</i>  SOMMERS SCHWARTZ  One Towne Square, 17th Floor  Southfield, MI 48076  Tel: (248) 355-0300  <a href="mailto:jthompson@sommerspc.com">jthompson@sommerspc.com</a></p>

<p>Gwen Simons  Simons &amp; Associates Law, P.A.  P.O. Box 1238  Scarborough, ME 04070-1238  Tel: (207) 205-2045  Fax: (207) 883-7225  Email: <a href="mailto:gwen@simonsassociateslaw.com">gwen@simonsassociateslaw.com</a></p>	<p>Larry McDevitt – <i>Chair, Class Certification Committee</i>  David Wilkerson – <i>Discovery Committee</i>  VAN WINKLE LAW FIRM  11 North Market Street  Asheville, NC 28801  Tel: (828) 258-2991  <a href="mailto:lmcdevitt@vwlawfirm.com">lmcdevitt@vwlawfirm.com</a>  <a href="mailto:dwilkerson@vwlawfirm.com">dwilkerson@vwlawfirm.com</a></p>
	<p>Carl S. Kravitz – <i>Expert Committee</i>  ZUCKERMAN SPAEDER LLP  1800 M Street NW, Suite 1000  Washington, DC 20036-5807  Tel: (202) 778-1800  Fax: (202) 822-8106  <a href="mailto:ckravitz@zuckerman.com">ckravitz@zuckerman.com</a></p>

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 1<sup>st</sup> day of September, 2015, electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Joe R. Whatley, Jr.  
Joe R. Whatley, Jr.